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24 July, 2019

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission 445 12th Street, SW  
Washington, District of Columbia 20554

RE: Implementation of Section 621(a)(1) of the Cable Communications  
Policy Act of 1984 as Amended by the Cable Television Consumer  
Protection and Competition Act of 1992, Third Report and Order - MB  
Docket No. 05-311

Dear Ms. Dortch,

I have been involved off and on with my local public access TV station since it's foundation in 1997. I started in high school as a founding member of the TV Club. I learned all I know today about how a local TV station operates from being a volunteer at Chelmsford Telemedia. I'm alarmed to learn of the FCC's proposed Third Report and Order, wherein Local Franchising Authorities ("LFA's") must treat cable-related, in-kind contributions as franchise fees subject to the statutory five percent franchise fee cap. I believe that this order threatens the continued operation of an irreplaceable civic and cultural resource in our community.

Chelmsford TV has maintained high quality programming in the educational, public, and government sectors throughout the years. What sets us apart from other PEG facilities is our comprehensive TV/Media education program I was involved in high school. This program continues to teach each new graduating class the many facets of journalism, broadcasting, and production values to be proficient in this media age where communication is more important than ever. We provide broadcast quality recording of school sports, concerts, and many other community events. Also featured at our station are recordings of most town municipal meetings, local debates, town parades, cultural festivals, and in-house TV shows. Many volunteers including myself make this programming happen.

The loss of revenue caused by the Order will force municipalities to either divert resources away from core municipal and school services to maintain existing PEG programming, suffer a dramatic reduction in the scope of PEG channels or lose them altogether.

The FCC's mission is to identify regulatory barriers, incentives, and build strong partnerships with public and private stakeholders in the media, yet the effects of this order seem destined to go against the public interest. This ruling strengthens the bottom lines of our cable monopolies and seems to fall in direct violation of our contract with Comcast and Verizon.

I strongly urge you to reconsider.

Sincerely,  
  
Michael Narbut